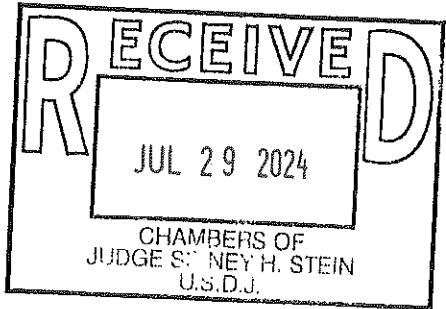


U.S.A. v. Robert Menendez 23cr490
(SHS)

Docket file



TWCG, LLC 
THE WALL STREET CAPITAL GROUP

District Judge Hon. Sidney H. Stein

United States Courthouse

500 Pearl Street Court room 23A

New York, NY 10007-1312

Subject: Senator Menendez sentencing on October 29, 2024

Dear Judge Stein,

I am a Wallstreet professional, specializing in Liquidity Risk Mgmt and Wallstreet Compliance. In addition, to the fact that, I was also, a New Jersey Constituent of 21 years, who was defrauded and violated by the Senator, Mr. Menendez, by his corruption, for which, he and his so-called “Banking Guy”, Mr. Alfie Feder, specifically had knowledge about the White-Collar



crimes of the Home Foreclosure fraud schemes occurring in Sparta New Jersey at 6 Crownview Court, Sparta, New Jersey 07871, (the family home of the Isenberg's until Dec 2022).

During 2021 through 2022, Senator Menendez and his so-called Banking expert, Mr. Alfie Feder, concealed their knowledge of the Home Foreclosure Frauds and my urgent requests for help regarding the home foreclosure frauds in Sparta NJ. I repeatedly spoke to Mr. Feder via phone calls and submitted many, many, emails briefing him with the PDF court filings attached in emails and the Docket sheet of all the ECF filings for the civil lawsuits I filed in the District of New Jersey and the Southern District of New York, urgently trying to stop the Home foreclosure fraud scheme and the severe harassment my family and I were enduring trying to save our loving family home after 21 years of peaceful living in Sparta, NJ whereby, we raised our two children and worked in NYC and NJ. The White-Collar crimes are evidenced in the current lawsuit 2:22-cv-02705 (BRM), (AME), the District of New Jersey.

III.0 Memorandum of law

STATE OF MIND F.R.C.P. 9(b)



The Second Circuit has held that Rule 9(b) requires fraud Complaints to allege facts that lead to a "strong inference" that the defendant has the requisite state of mind
The language of the second sentence of Rule 9(b) is simple: "Malice, intent, knowledge, and other conditions of a person's mind may be alleged generally." F.R.C.P. 9(b).

Senator Menendez and Mr. Feder both had the requisite state of mind as a Senator and a Banking expert, serving New Jersey constituents, who pay significant Federal, State, and Township taxes, all of which funnels into their salaries! They both acted in concert together, concealing their knowledge about the Consumer law violations and the Home foreclosure Fraud schemes happening in Sparta, NJ. Senator Menendez had the power to intervene and to stop the nefarious and illegal actions by Goldman Sachs, Credit Suisse, and the Parker Ibrahim & Berg lawyers who, filed a false Police report containing false information and nefarious allegations against me as a means of retaliation and harassment for filing a federal lawsuit against Credit Suisse the Mortgage Servicer, for Consumer law violations.



The lawyers representing SPS/Credit Suisse were able to get a dirty Wantage Township Judge, named Glen Gavan, to issue an Order for a Search Seize TERPO, based on false, crafted evidence, known to be false, permitting six Sparta Police Officer to search my home and seize my husband's heirloom rifles. A means of harassment in connection with the collection of the alleged mortgage loan debt. A false email known to be false by the lawyers and the Wantage Township Judge, and the NJ Superior Court Assistant Prosecutor Ms. Laura Nazzaro.

I respectfully request the Menendez sentencing be as long as possible for his crimes.

The Nefarious Crimes that destroyed my loving family home and my marriage of 34 years to a man I loved, a good husband and a great father, for which, I was living with since I was 22 years old!

I've endured years of severe emotional distress and money stolen exceeding \$500k, all while, Senator Menendez was receiving Loads of Cash, Gold Bars and a Mercedes and living a wealthy life off the backs of Hard-working, ethical, business professionals like me!



I want him to know how he personally played a role in breaking up my marriage of 34 years, forcing us to urgently sell our loving family home with many fond memories, at a significant discount, causing a Financial loss of over \$500k! A beautiful home in Sparta NJ where we raised our two kids. One graduated from Columbia University in May 2023 with his MBA, already designated with a CFA, living, working, in NYC, now at his second Hedge fund after the first one in Boston and also a graduate of UVA with a B.S. degree in Econometric Statistics.

ALL ACHIEVED WITH HARD WORK, ETHICS AND OUR OWN MONEY, while THE FRAUDSTERS STOLE OUR MONEY, OUR LOVING FAMILY HOME, LEAVING US FINANCIALLY & EMOTIONALLY BROKEN, EACH TRYING TO RECOVER SEPERATELY!

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sherry Scalercio-Isenberg".

Sherry Scalercio-Isenberg Date: July 19, 2024



Attachments:

- [1] 2:22-cv-02705 First Amended Complaint**
- [2] 2:22-cv-02705 Second Amended Complaint**
- [3] ECF#83 Opposition To Motion To Dismiss**

- [4] The Brief on the Dirty Judge in the NJ State Superior Court controlling Fraudulent Home Foreclosures against innocent, responsible Homeowners!**



Attachments:

- [1] 2:22-cv-02705 First Amended Complaint
- [2] 2:22-cv-02705 Second Amended Complaint
- [3] ECF#83 Opposition To Motion To Dismiss

- [4] **The Brief on the Dirty Judge in the NJ State Superior Court controlling Fraudulent Home Foreclosures against innocent, responsible Homeowners!**



I want him to know how he personally played a role in breaking up my marriage of 34 years, forcing us to urgently sell our loving family home with many fond memories, at a significant discount, causing a Financial loss of over \$500K! A beautiful home in Sparta NJ where we raised our two kids. One graduated from Columbia University in May 2023 with his MBA, already designated with a CFA, living, working, in NYC, now at his second Hedge fund after the first one in Boston and also a graduate of UVA with a B.S. degree in Econometric Statistics.

ALL ACHIEVED WITH HARD WORK, ETHICS AND OUR OWN MONEY, while THE FRAUDSTERS STOLE OUR MONEY, OUR LOVING FAMILY HOME, LEAVING US FINANCIALLY & EMOTIONALLY BROKEN, EACH TRYING TO RECOVER SEPERATELY!

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sherry Scalerio-Isenberg".

Sherry Scalerio-Isenberg Date: July 19, 2024

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
DOCKET No. 2:22-CV-02705 - KM - AME**

First Amended Complaint

SHERRY SCALERCIO-ISENBERG

-----x

Plaintiff (ProSe)

-against-

SELECT PORTFOLIO SERVICING,INC. (SPS)

-----x

(Defendant#1)

Mitchell Scott Kurtz, esq. in his individual and professional capacities

-----x

(Defendant#2)

Robert D. Bailey,esq. in his individual and professional capacities

-----x

(Defendant#3)

Brett Lawrence Messinger, esq. in his individual and professional capacities

-----x

(Defendant#4)

Kassia Fialkoff, esq. in her individual and professional capacities

-----x

(Defendant #5)

1. Preliminary Statement: This Civil Action is a classic case of Racketeering Corrupt Organizations title 18 RICO Federal statute Section 1901 (a), 18 PART I CHAPTER 96 18 U.S. Code Chapter 96 -RACKETEER INFLUENCED AND CORRUPT Organizations by all the Defendants named in this action and identified in the exhibits and attachments filed under 2:22-cv-02705 and all related civil actions.

2. Furthermore, the Title 15U.S.C. Consumer Protection laws were enacted under the Dodd Frank Act of 2010 to protect Consumers from Fraudsters, NOT to be used as a tool by lawyers and judges against victims of consumer fraud OR, to give County Judges the power to endorse and help facilitate mortgage Bank fraud against responsible homeowners!

3. The wanton, coordinated actions by all five Defendants, spanning for over four years from 2019 -2023 are detailed in this First Amended Complaint and includes a substantial amount of material facts of evidence already filed on the court docket as exhibits in several related lawsuits, all giving rise and support to this First Amended Complaint [FAC].

4. Rather than re-filing all the same exhibits and attachments again, for which is over 100 documents, only new or key exhibits with critical supporting evidence that has not previously been filed for this case, are filed as support with this FAC. A Judge may consider evidence filed with the initiating papers. For convenience, a list of all supporting exhibits of evidence that have already been filed on the docket for this case, is attached as the last page after the signature page for this FAC.

5. This is an action involving deep layers of organized crime with Residential Mortgage-Backed Securities RMBS fraud, with the utmost lawyer misconduct and fraudulent schemes and artifices, that surfaced in 2019 and have been executed and fully carried out in 2023 by all the lawyers representing and/or associated with the Mortgage Creditor, the Mortgage Servicer and the Credit Reporting Agencies. All of these companies and their lawyers play a critical role controlling and facilitating the many stages of this fraud RMBS scheme. A Wallstreet process filled with fraud and deceit facilitating fraud with Consumer loans that are bought and sold by the big Wallstreet banks and packaged together to create the RMBS.

6. A Goldman Sachs Mortgage loan Creditor leads the fraudulent scheme and uses multiple business names under the Goldman Sachs brand; names such as MTGLQ INVESTORS LP, GOLDMAN SACHS MORTGAGE COMPANY or

LEGACY MORTGAGE ASSET TRUST 2019 GS-7; these are all entities licensed under the Goldman Sachs brand, authorized to buy, sell and hold

7. residential mortgages, forcing homeowners to become a Victim of Goldman Sachs mortgage fraud!

8. Shortly after Goldman Sachs buys the Consumer loan, notices are sent out to the homeowner by the CORRUPT mortgage servicer Select Portfolio Servicing SPS, to help facilitate the crime of mortgage fraud, using servicing fraud schemes when they produce the monthly mortgage statements with false, inaccurate numbers and information, whereby they make a direct extortion demand on the homeowner to either pay up now! Or the mortgage Creditor, **Goldman Sachs, [a partner in crime with SPS]** will foreclose on the home! Any person who dares to dispute and challenge this fraudulent scheme is physically violated with Search and Seize Orders or other items, for which are illegally obtained by lawyers from dirty local county Judges and prosecuted by dirty prosecutors! A classic case of RICO! Several investigative Journalists in NY and CT have uncovered and reported on this RICO mortgage crime, it's been attacking homeowners for more than 10 years after the 2008 financial crisis.

9. The Parties

10. The Plaintiff is a Wallstreet professional with expertise in Banking, Liquidity Risk Management and Wallstreet Compliance and holds a BS. Degree in Finance, an MBA in Finance with an applied thesis in M&A and over 15 years of deep knowledge & experience in many areas of Wallstreet.

11. Defendant #1 is a Mortgage Servicer owned by the Wallstreet Powerhouse Credit Suisse Group, who is no longer a Party to this Action. Credit Suisse was dismissed in ECF#35/ #36 Order filed Feb 28,2023.

12. Defendants #2, #3, #4 and #5 are lawyers who knowingly and willingly joined a conspiracy to defraud the Plaintiff and her husband, giving rise to CONSPIRATORAL WIRE FRAUD MORTGAGE FRAUD AND RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS.

13. Although, the **Former General Counsel of Goldman Sachs Ms. Karen Patton Seymour**, located in New York, is not a named Defendant in this Action, she is the main facilitator of the fraud scheme and the sole decision maker in 2019, when the fraud surfaced and the Plaintiff brought forward evidence of mortgage fraud and numerical inaccuracies on her mortgage statements after Goldman Sachs purchased the Plaintiff's loan from MetLife and transferred the mortgage servicing from Shellpoint servicing to Select Portfolio Servicing.

14. Ms. Seymour threatened the Plaintiff through Mitchel Scott Kurtz, esq. who was counsel for the Goldman Sachs servicer SPS. The Plaintiff was told to shut up and to never go back to the Goldman Sachs HQ at 200 West street NY, NY or there will be consequences! Despite, the plaintiff was a Customer of Goldman Sachs and properly scheduled an appointment through Ms. Seymour's assistant in order to show her the major inaccuracies of an increase of over \$100k in the mortgage balance that suddenly appeared on the monthly mortgage statement in one month, from October 2019 to Nov. 2019, exhibits previously filed in two federal lawsuits.

15. The Plaintiff repeats:

16. The Plaintiff has produced over **three years of PNC Bank Mortgage and Tax payment confirmations, produced and filed on the court docket as exhibits in three federal lawsuits, [2:22-cv-02705 [KM], 121:cv-04124 [KPF]; 3:20-CV-04125 [AET]; 2:20-CV-11222] [JMV];**

17. Proving the Plaintiff and her husband have never missed any Mortgage payments and were current with home property Tax payments required to keep their home property safe and in good standing, DEBUNKING any possibility of a legitimate mortgage loan default and home foreclosure!

18. And furthermore, proving their Credit history was perfect prior to 2019 when the Defendants all joined the conspiracy of the Goldman Sachs Organized Crime and attacked the Plaintiff and her husband!

19. FIRST Cause of Action RICO ~~Federal statute Section 1901 (a), 18~~

PART I CHAPTER 96 18 U.S. Code Chapter 96 -RACKETEER INFLUENCED AND CORRUPT Organizations, the crime is committed by

- **Defendant #1**
- **Defendant#2**
- **Defendant#3**
- **Defendant#4**
- **Defendant#5.**

20. How the RICO Mortgage Fraud Scheme works:

21. The Plaintiff's monthly mortgage payments are received by Select Portfolio Servicing, Defendant #1, [SPS], directly from PNC Bank online banking and usually within 24 hours of receiving this payment directly from PNC Bank, the money is withdrawn from the Plaintiff's checking account #3903.

22. SPS then diverts the money payment to an account titled Unapplied and is listed on the mortgage statements as "Unapplied" money and SPS never applies the money as a credit against the mortgage balance for which would reduce the mortgage debt balance.

23. Then Defendant SPS reports to the Credit reporting agencies No Payment has been made by the Plaintiff, causing damage to the Plaintiff's Credit in order to block and prevent the Plaintiff from qualifying for a Mortgage refinance with a new, legitimate, Mortgage lender! SPS also adds increased Debt balances of over \$100,000.00 on the monthly mortgage statements, secretly changing the outstanding mortgage balance and labeling other fraudulent increases to the debt as "Escrow shortage" or "Impound Advance Fees" and adds over \$24,000.00 in Legal fees used to pay the lawyers to harass torment and torture the Plaintiff and her family! See **Exhibit# FAC.05 December 2022 payoff statement.**

24. From 2019 – 2022 the Plaintiff makes many formal, legal written disputes every week/month for years to the Creditor, the mortgage servicer and all the credit reporting agencies, i.e., Transunion. All these business' refuse to make immediate

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEW JERSEY**
3 **DOCKET No. 2:22-CV-02705 - BRM - AME**

4
5 **SECOND AMENDED COMPLAINT**
6
7

8
9 SHERRY SCALERCIO-ISENBERG
10 -----x

11 Plaintiff (ProSe)
12
13

14 -against-
15
16

17 SELECT PORTFOLIO SERVICING,INC. (SPS)
18 -----x

19 (Defendant#1)
20
21

22 Mitchell Scott Kurtz, esq. in his individual and professional capacities
23 -----x

24 (Defendant#2)
25
26

27 Robert D. Bailey,esq. in his individual and professional capacities
28 -----x

29 (Defendant#3)
30
31

32 Brett Lawrence Messinger, esq. in his individual and professional capacities
33 -----x

34 (Defendant#4)
35
36

37 Kassia Fialkoff, esq. in her individual and professional capacities
38 -----x

39 (Defendant #5)
40
41
42
43
44

45

46 1.1 Procedural History and Background:

47

48

49 1.2 On January 31,2024 The Honorable USD Judge Brian Martinotti filed
50 his Opinion and Order (ECF# 71 and ECF# 72), as to the Duane Morris
51 Defendants Motion To Dismiss (ECF#54). The Order granted the Plaintiff
52 leave to file a Second Amended Compliant. In the Order, several Counts
53 were dismissed without Prejudice, allowing the Plaintiff to correct the
54 deficiencies by filing a Second Amended Complaint. **ECF#72 ORDERED**
55 **that Counts II, III, and VII of the First Amended Complaint(ECF No. 40) are**
56 **DISMISSED WITHOUT PREJUDICE as to the Duane Morris Defendants.**
57 The Duane Morris Defendants are stated in the Order together as: “(Select
58 Portfolio Servicing, Inc.,) (SPS), (Brett L. Messinger), and (Kassia
59 Fialkoff) “together, the Duane Morris Defendants”.

60

61 **1.3 Important footnote in the ORDER ECF#72, in the footnote it states,**

62 1.4 “Defendants Mitchell Scott Kurtz, esq., and Robert D. Bailey, esq.,
63 did not participate in this
64 Motion to Dismiss.” (ECF No. 54.).

65

66 1.5 For clarification, the footnote confirms that none of the Causes of
67 Action against Mitchell Scott Kurtz and Robert D. Bailey were
68 dismissed in ECF#54 because, as Judge Martinotti noted, these two
69 Defendants did not participate in the Motion To Dismiss. Nothing
70 was dismissed against Mitchell Scott Kurtz nor Robert D. Bailey.

71

72 However, On February 16,2024, Judge Martinotti, issued another
73 Opinion and Order, ECF#76 and ECF#77 further addressing the
74 Parker Ibrahim & Berg Defendants and the deadline to file a
75 Comprehensive Second Amended Complaint.

76

77

78 **1.6 Defined Terms under the FDCPA**

79

80 **DEBT COLLECTOR**

81

82 Under the FDCPA, a "Debt Collector" is defined as any person who
83 regularly collects, or attempts to collect, consumer debts for another
84 person or institution or uses some name other than its own when collecting
85 its own consumer debts. That definition would include, for example, an
86 institution that regularly collects debts for an unrelated institution.

87

88 **1.7 CONSUMER**

89 The term "**CONSUMER**" means any natural person obligated or
90 allegedly obligated to pay any debt.

91

92 **1.8 The Parties:**

93 **DEFENDANTS**

94

95 Defendant #1 SPS is an institution that regularly collects debts for an
96 unrelated institution. SPS was collecting a debt for Goldman Sachs,
97 Legacy Mortgage Asset Trust. SPS is a Debt Collector defined under the
98 FDCPA.

99 Defendant #2 is the lawyer of Parker Ibrahim & Berg who was collecting
100 a debt for SPS, an unrelated institution. Defendant#2 meets the legal
101 definition of a Debt Collector under the FDCPA.

102

103 Defendant #3 is the lawyer of Parker Ibrahim & Berg who was collecting
104 a debt for SPS, an unrelated institution. Defendant#3 meets the legal
105 definition of a Debt Collector under the FDCPA.

106

107 Defendant #4 is the lawyer of Duane Morris, LLP who was collecting a
108 debt for SPS and Legacy Mortgage Asset Trust, an unrelated institution.
109 Defendant #4 meets the legal definition of a Debt Collector under the
110 FDCPA.

111

112 Defendant #5 is the lawyer of Duane Morris, LLP who was collecting a
113 debt for SPS and Legacy Mortgage Asset Trust, an unrelated institution.
114 Defendant #5 meets the legal definition of a Debt Collector under the
115 FDCPA.

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEW JERSEY**
3 **DOCKET No. 2:22-CV-02705 - BRM - AME**

4
5 **OPPOSITION TO MOTION TO DISMISS**
6
7

8 **The Second Amended Complaint**
9
10

11
12
13 **SHERRY SCALERCIO-ISENBERG**
14 -----x
15 Plaintiff (ProSe)
16
17 -against-
18
19
20 **SELECT PORTFOLIO SERVICING,INC. (SPS)**
21 -----x
22 (Defendant#1)
23
24
25
26 Mitchell Scott Kurtz, esq. in his individual and professional capacities
27 -----x
28 (Defendant#2)
29
30
31 Robert D. Bailey,esq. in his individual and professional capacities
32 -----x
33 (Defendant#3)
34
35
36 Brett Lawrence Messinger, esq. in his individual and professional capacities
37 -----x
38 (Defendant#4)
39
40
41 Kassia Fialkoff, esq. in her individual and professional capacities
42 -----x
43 (Defendant #5)

44

45 **I.0 Preliminary statements:**

46 For efficiency, and in respect of Your Honor's time, The Plaintiff has filed
47 only one Comprehensive, Consolidated Opposition in Response to both
48 Motions To Dismiss ECF#81-1 and ECF#82-1. **ECF#81-1 is a MTD**
49 **Brief** filed as to Select Portfolio Servicing & the Duane Morris
50 Defendants. **ECF#82-1 is a MTD Brief** filed as to the PIB Lawyer
51 Defendants.

52

53 **Your Honor,**

54 I followed your Orders closely and corrected the deficiencies you
55 noted as to the First Amended Complaint.

56 The Second Amended Complaint specifically reflects the corrections for
57 which you gave guidance on, in the Orders.

58 **The adhominem attacks against me by the Defense Counsel**
59 claiming otherwise, and disparaging me, is to distract you from the real
60 truth about the lawyer misconduct and fraud that has caused the Plaintiff
61 significant financial damages, among years of severe emotional distress
62 in connection with the collection of the alleged Mortgage Loan debt.

63

64 **II.0 Background and Supporting Material Facts**

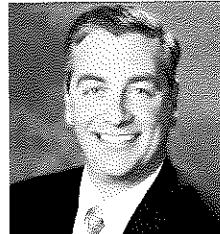
65 **The Plaintiff's Residential Mortgage Loan had no issues from Origination**
66 **with Quicken Loans in November 2010 and continued to be correct when**
67 **Chase Bank held the loan in 2011-2014. The significant inaccuracies with**
68 **the Outstanding Mortgage Principle Balance and the false payment**
69 **information**

70 **surfaced in April 2019, after the Investor MetLife, sold the Plaintiff's**
71 **Mortgage loan to Goldman Sachs! The MetLife Investment law attorney,**
72 **Mr. Tom Pasuit, is a witness. He called me on the phone in response to my**
73 **call to him. Mr. Pasuit connected me with the Mortgage Servicer Shellpoint**
74 **Servicing Compliance department, who was the Mortgage Servicer during**
75 **the time MetLife was the Investor of the Plaintiff's Mortgage Loan.**

**THE BRIEF: IN PURSUIT OF JUSTICE AGAINST DIRTY
JUDGES & DIRTY LAWYERS**

**A DIRTY JUDGE AND A DIRTY LAWYER IN CONSPIRACY TO
COMMIT HOME FORORECLOSURE FRAUD in the**

**SUPERIOR COURT OF NEW JERSEY CHANCERY-Equity
DIVISION
SUSSEX COUNTY
DOCKET No. F-007893-22 filed July 29,2022**



**[HTTPS://WWW.PLI.EDU/FACULTY/HON.-FRANK-J.-DEANGELIS-J.S.C.-
1815479](https://www.pli.edu/faculty/hon.-frank-j.-deangelis-j.s.c.-1815479)**

**Dirty Judge Deangelis tried and tried to Fraudulently foreclose our
loving family home in Sparta , New Jersey, 6 Crownview Court
07871, with the help of**

Dirty lawyer Brett Lawrence Messinger.



BRETT L. MESSINGER FILED THE FRAUDULENT MORTGAGE LOAN DEFAULT, for which was used to support the filing of the Foreclosure Case Information Sheet. The FCIS is copied below and is also included in the federal lawsuit 2:22-cv-02705, First Amended Complaint filed as an exhibit ECF #40-4 and also referenced in the Second Amended Complaint.

An image of the Superior court docket sheet is shown in the First Amended Complaint on page ID373 THRU 375, proving the fraudulent actions and Orders of Judge Deangelis & lawyer Messinger in Conspiracy to commit Home Foreclosure Fraud against the home of the Isenberg's.

SWC-F-007893-22 07/29/2022 4:14:34 PM Pg 1 of 17 Trans ID: CHC2022176074

CASE INFORMATION STATEMENT (FCIS)		FOR USE BY CLERK'S OFFICE ONLY
 <p>Use for initial Chancery Division – General Equity foreclosure pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6(c), if information is not furnished or if attorney's signature is not affixed.</p>		<input type="checkbox"/> CCK <input type="checkbox"/> CG <input type="checkbox"/> CA <input type="checkbox"/> IMO RECEIPT NO. AMOUNT: OVERPAYMENT: BATCH NUMBER: BATCH DATE: XXXXXXXXXX
SECTION A: TO BE COMPLETED BY ALL PARTIES <p><i>[Handwritten Signature]</i></p> <p>Plaintiff: Legacy Mortgage Asset Trust 2019-GS7 v. HERRY SCALERCIO ISENBERG: MR. ISENBERG, HUSBAND OF HERRY SCALERCIO ISENBERG; MARCUS K. ISENBERG: MRS. ISENBERG, WIFE OF MARCUS K. ISENBERG; and CHARTER ONE, A DIVISION OF RBS CITIZENS, N.A., n/k/a CITIZENS BANK, N.A. NAME(S) OF FILING PARTY(IES) (e.g. John Doe, Plaintiff)</p> <p>Defendant: Legacy Mortgage Asset Trust 2019-GS7, Plaintiff</p>		
ATTORNEY NAME (IF APPLICABLE)	FIRM NAME (IF APPLICABLE)	COUNTY OF VENUE
Brett L. Messinger	Duane Morris LLP	SUSSEX
MAILING ADDRESS	DOCKET NUMBER (when available)	
30 South 17th Street, Philadelphia, PA 19103	(215) 979-1000	
SECTION B: TO BE COMPLETED BY PLAINTIFF TO INITIAL COMPLAINT		
FORECLOSURE CASE TYPE NUMBER	IS THIS A HIGH RISK MORTGAGE PURSUANT TO P.L.2009,C.84 AND P.L.2008,C.127	
<input type="checkbox"/> 088 IN PERSONAM TAX FORECLOSURE <input type="checkbox"/> 089 IN REM TAX FORECLOSURE <input checked="" type="checkbox"/> 0RF RESIDENTIAL MORTGAGE FORECLOSURE <input type="checkbox"/> 0CF COMMERCIAL MORTGAGE FORECLOSURE <input type="checkbox"/> OCD CONDOMINIUM OR HOMEOWNER'S ASSOCIATION <input type="checkbox"/> LIEN FORECLOSURE <input type="checkbox"/> 091 STRICT FORECLOSURE <input type="checkbox"/> OFP OPTIONAL FORECLOSURE PROCEDURE (NO SALE) <input type="checkbox"/> OTS TIME SHARE FORECLOSURE	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, LIST DOCKET NUMBERS: 2'22-CV-02765 AND 1:21-CV-04124	
FULL PHYSICAL STREET ADDRESS OF PROPERTY:	MUNICIPALITY CODE (*)	
6 CROWNVIEW COURT, SPARTA, NJ 07871	1918 – TOWNSHIP OF SPARTA	
ZIP CODE: 07871	MUNICIPAL BLOCK: 23001	
ZIP CODE: 07871	COUNTY: Sussex	LOT: 10
ALL FILING PARTIES MUST SIGN AND PRINT NAME(S) AND DATE THE FORM BELOW		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).		
ATTORNEY / SELF REPRESENTED SIGNATURE <i>/s/ Brett L. Messinger</i>	PRINT ATTORNEY / SELF REPRESENTED NAME Brett L. Messinger	DATE July 29, 2022

Gallagher, Saliba & Fried, P.A. July 29, 2022

III.0 Memorandum of law

STATE OF MIND F.R.C.P. 9(b)

The Second Circuit has held that Rule 9(b) requires fraud Complaints to allege facts that lead to a “strong inference” that the defendant has the requisite state of mind

The language of the second sentence of Rule 9(b) is simple: “Malice, intent, knowledge, and other conditions of a person’s mind may be alleged generally.” F.R.C.P. 9(b).

Judge Deangelis and lawyer Messinger had the requisite state of mind as lawyers. They violated all ethics in pursuit of stealing the Isenberg home via a Fraudulent Home Foreclosure!

Judge Deangelis concealed his knowledge of the Contested fraudulent home foreclosure, for which several Federal lawsuits were filed and active, proving beyond a reasonable doubt the fraud home foreclosure was fully contested by Ms. Scalercio-Isenberg.

Judge Deangelis willfully acted in concert with Messinger and ignored the evidence of the Federal lawsuits and the Motion to Vacate the Fraud home foreclosure and the many opposition filings on the Superior court docket, IN CONSPIRACY TO COMMIT HOME FORECLOSURE FRAUD!

Ms. SHERRY SCALERCIO-ISENBERG BEAT THEM IN NJ SUPERIOR COURT; WE URGENTLY SOLD OUR HOME AND SUFFERED A SUBSTANTIAL FINANCIAL LOSS BEFORE THE DIRTY JUDGE DEANGELIS COULD WRITE AN

ANOTHER ORDER TO FRAUDULENTLY FORECLOSE IT AND SEND A SHERIFF TO TAKE US OUT AND COLLECT MORE MONEY FOR THE LEGAL WORK OF A FRAUD FORECLOSURE!

DIRTY LAWYER BRETT L. MESSINGER ADDED OVER \$24,000.00 IN LEGAL FEES TO THE MORTGAGE LOAN PAY-OFF STATEMENT! I MARKED IT AS FRAUD IN THE COURT EXHIBIT! MONEY FOR HIM AND DIRTY JUDGE DEANGELIS! Plus over \$160,00.00 in fraudulent fees were added to the official Mortgage Loan payoff statement for which the Isenberg's Real-estate lawyer paid with a check in order to close on the sale of the home!

DIRTY JUDGE DEANGELIS WROTE AN ORDER TO SEND THE CASE TO THE CHANCERY COURT DIVISION THAT HANDLES FORECLOSURE JUDGEMENTS, STATING IN THE ORDER, THE FRAUD FORECLOSURE WAS “DEEMED UNCONTESTED” A BLATANT LIE!

DEANGELIS COMMITTED FRAUD AND VIOLATED FEDERAL LAW BY CONCEALING HIS KNOWLEDGE OF ALL THE FEDERAL LAWSUITS PROVING MORTGAGE SERVICING FRAUD AND MANY CONSUMER LAW VIOLATIONS. AND AT LEAST 25 CONTESTED & OPPOSITION FILINGS IN TWO US DISTRICT COURTS, N.J. AND THE SOUTHERN DISTRICT OF NEW YORK. THE DIRTY JUDGE DEANGELIS WAS GIVEN CONTROL OF THE CHANCERY DIVISION THAT HANDLES HOME FORECLOSURES. HE HAD CONTROL IN 2022 OVER THE ISENBERG HOME. HE TRIED & TRIED TO FORECLOSE IT! I KEPT FILING AND FILING EVIDENCE IN OPPOSITION AND A MOTION TO VACATE! \$100.00 OR more for every filing on the docket in the Superior court! Cost me another \$1,000.00 to fight the Fraud Foreclosure AND A DIRTY, DIRTY JUDGE!

CONCLUSION

DEANGELIS LIED AND HAD THE REQUISITE STATE OF MIND
FRCP 9 (b), as a lawyer and a Judge controlling Home
Foreclosures in the State of New Jersey CHANCERY EQUITY
DIVISION! I CAUGHT HIM IN THE ACT OF HOME
FORECLOSURE FRAUD and COPIED the image of Superior
Court docket sheet for the fraud Home Foreclosure into my
Federal lawsuit Complaint [2:22-cv-02705], for which the
Federal Judge on the case; USDJ Brian R. Martinotti, noted
in his Order that he can consider the New Jersey State
Superior Court docket sheet as evidence, supporting material
facts, because I included it directly in the Complaint.

THE FAÇADE OF DIRTY JUDGE DEANGELIS,

pretending to be an advocate for battered women of domestic
violence while he violated me and my family! Detailed in
lawsuit 2:22-cv-02705 [BRM]. No ethics, another lie in his
Bio.

[HTTPS://WWW.PLI.EDU/FACULTY/HON.-FRANK-J.-DEANGELIS-J.S.C.-](https://www.pli.edu/faculty/hon.-frank-j.-deangelis-j.s.c.-i815479)
i815479

BIO FROM WEBSITE

judge DeAngelis served as the Chair of the Supreme Court of
New Jersey, District V-A Ethics Committee from 2013-
2016. He also served as a member of the Board of Trustees
of Partners for Women and Justice, a non-profit that

provides pro bono legal services to victims of domestic violence from 2012-2016.

LIZ PRESNELL, ESQ. APPEARS TO HOLD A LEADERSHIP POSITION IN THIS 501C-3 FOR BATTERED WOMEN OF DOMESTIC VIOLENCE.

OUR MISSION

Welcome to Partners (formally Partners for Women and Justice), a non-profit public interest law firm committed to making a meaningful impact in the lives of domestic violence and sexual assault victims. We have been dedicated to providing legal representation, advice, and counseling sessions to those in need. Our mission extends beyond gender boundaries, as we proudly serve women, and members of the LGBTQ+ community.

END THE CORRUPTION OF JUDGE DEANGELIS & THE LAWYERS

